

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

GMAC REAL ESTATE, LLC, a Delaware
Limited Liability Company,

Plaintiff,

v.

BLAKE REALTY, LLC, a Wisconsin Limited
Liability Company, and **RYAN BLAKE**,
an individual.

Defendants.

CASE NO. 08 C 987

**Presiding Judge Anderson
Magistrate Judge Keys**

MOTION FOR DEFAULT JUDGMENT

NOW COMES, the Plaintiff, **GMAC REAL ESTATE, LLC**, a Delaware
Limited Liability Company, ("PLAINTIFF"), by and through its attorneys, FUCHS &
ROSELLI, LTD., and for its *Motion for Default Judgment*, states as follows:

1. Plaintiff filed its Verified Complaint for Injunctive and Other Relief on
February 18, 2008.

2. On March 5, 2008, Defendants were served with summons. (See affidavit
of Service, attached as Exhibit A).

3. Under FRCP 12(a)(1)(A) Defendants were to have filed their Answer and
Appearance by or before March 25, 2008. To date, Defendants have not answered
Plaintiff's Complaint and no appearance has been filed.

4. Pursuant to FRCP 55(a) Plaintiff is entitled to a judgment of default.

5. PLAINTIFF, upon demand by this Court, is fully prepared to prove-up its case in support of the *Verified Complaint* filed herein.

WHEREFORE, the Plaintiff, GMAC Real Estate, LLC, respectfully requests that this Honorable Court enter a Judgment of Default against all Defendants and grant such affirmative relief as requested by Plaintiff in its Complaint and for such other further relief that this Court deem fair and proper.

Respectfully submitted,

GMAC REAL ESTATE, LLC, Plaintiff

By: \s\ Daniel E. Wiesch
One of Its Attorneys

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